

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Baltimore Division)

_____	)	
In re:	)	
	)	Case No. 25-12356-NVA
CHASEN CONSTRUCTION, LLC,	)	
	)	
Debtor.	)	(Chapter 11)
_____	)	
In re:	)	
	)	
BRANDON M. CHASEN SR.	)	Case No. 25-15437-NVA
	)	
Debtor.	)	(Chapter 7)
_____	)	

**MOTION FOR RULE 2004 EXAMINATION**  
**(Love's Exotics LLC)**

COMES NOW, Roger Schlossberg, Chapter 11 Trustee for the bankruptcy estate of Chasen Construction LLC (the "Chapter 11 Trustee"), and Zvi Guttman, Chapter 7 Trustee for the bankruptcy estate of Brandon M. Chasen Sr. (the "Chapter 7 Trustee") (collectively, the "Trustees" or "Movants"), and in support of their *Motion for Rule 2004 Examination of Love's Exotics LLC* (the "*Motion*"), hereby respectfully represents as follows:

**Background**

1. On March 19, 2025, a bankruptcy proceeding was commenced against Chasen Construction, LLC ("Chasen Construction") upon the filing of an *Involuntary Petition* under Chapter 11 of the Bankruptcy Code by Sandy Spring Bank ("Sandy Spring"), Southland Insulators of Maryland, Inc., and Ferguson Enterprises, Inc. (collectively, the "Petitioning Creditors"). [Dkt. #1 in Case No. 25-12356].

2. On that same date, Sandy Spring Bank filed an *Emergency Motion to Appoint Chapter 11 Trustee* (the “*Emergency Motion*”). [Dkt. #3 in Case. No. 25-12356]. Following the conduct of expedited proceedings on that *Emergency Motion* commencing on March 24, 2025, this Court orally announced its ruling on March 25, 2025 and subsequently caused to be issued on March 26, 2025 its *Order Granting Emergency Motion to Appoint Chapter 11 Trustee and Directing the Appointment of a Chapter 11 Trustee*. [Dkt. #22 in Case No. 25-12356].

3. Mr. Schlossberg thereafter was appointed by the Acting United States Trustee for Region Four to serve as the Chapter 11 Trustee for the bankruptcy estate of Chasen Construction. [Dkt. #23 in Case No. 25-12356]. This Court approved Mr. Schlossberg’s appointment on March 27, 2025. [Dkt. #26 in Case No. 25-12356]. Mr. Schlossberg thereafter accepted appointment as the Chapter 11 Trustee herein, duly qualified for that position and has been acting in said fiduciary capacity through the date hereof.

4. On June 16, 2025, the aforementioned Petitioning Creditors commenced a bankruptcy proceeding against Brandon M. Chasen Sr. (“Mr. Chasen”), one of the principals of Chasen Construction,<sup>1</sup> upon the filing of an *Involuntary Petition* under Chapter 7 of the Bankruptcy Code. [Dkt. #1 in Case No. 25-12437].

5. On July 11, 2025, Mr. Chasen moved to convert Case No. 25-12437 to a voluntary case under Chapter 7 of the Bankruptcy Code. [Dkt. #23 in Case No. 25-12437]. On July 30, 2025, this Court granted Mr. Chasen’s motion to convert the case to a voluntary proceeding. [Dkt. #29 in Case No. 25-12437].

6. Mr. Guttman thereupon duly was appointed Chapter 7 Interim Trustee of Mr. Chasen’s bankruptcy estate. Following the convening of that meeting of creditors required to be

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<sup>1</sup> Mr. Chasen owns 50% of the membership interest in Chasen Construction, LLC. Paul W. Davis owns the remaining 50% membership interest in Chasen Construction.

conducted pursuant to 11 U.S.C. § 341(a) without the request by creditors for the election of a trustee as permitted by 11 U.S.C. § 702(b) and (c), the appointment of Mr. Guttman ripened into that of permanent Chapter 7 Trustee pursuant to the provisions of 11 U.S.C. § 702(d).

**Jurisdiction, Venue, Etc.**

7. This Court is vested with jurisdiction over the above-captioned administrative cases and this contested matter pursuant to 28 U.S.C. § 1334, 28 U.S.C. § 157(a) and United States District Court Local Rule 402. Further, this contested matter is a “core” proceeding pursuant to the provisions of 28 U.S.C. § 157(b)(2)(A) and (O). Venue in this Court is appropriate pursuant to the provisions of 28 U.S.C. §§ 1408 and 1409(a).

**Parties**

8. Your Movants jointly seek authority by the instant *Motion* to conduct an examination pursuant to the provisions of Bankruptcy Rule 2004.

9. The party as to whom your Movants seek to examine pursuant to the provisions of Bankruptcy Rule 2004 is Love’s Exotics LLC (hereinafter referred to as “Love’s Exotics”), a limited liability company organized under the laws of the State of Florida which maintains its principal office at 68 SE 6th Street, Unit 808, Miami, FL 33131.

**Legal Authority for Rule 2004 Examination**

10. Bankruptcy Rule 2004(a) provides that “[o]n motion of any party in interest, the court may order the examination of any entity.” Fed. R. Bankr. P. 2004(a). Rule 2004 permits the “examination of an entity . . . relat[ing] only to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor’s estate...” *Id.* The term “entity” includes any governmental unit. 11 U.S.C. § 101(15).

11. Bankruptcy Rule 2004 uniformly has been held to provide a broad power to investigate *any* matter that may affect the administration of the estate, particularly regarding the discovery of assets of estate and exposure of any fraudulent conduct. *See In re Symington*, 209 B.R. 678, 683 (Bankr. D. Md. 1997); *In re Bennett Funding Group, Inc.*, 203 B.R. 24, 27-28 (Bankr. N.D.N.Y. 1996); *In re Drexel Burnham Lambert Group, Inc.*, 123 B.R. 702, 708 (Bankr. S.D.N.Y. 1991). The Rule is designed to provide a “sweeping general examination” of debtors, the scope of which is “unfettered and broad.” *In re Symington*, 209 B.R. at 683; *In re GHR Energy Corp.*, 33 B.R. 451, 453-54 (Bankr. D. Mass. 1983). The scope of a Bankruptcy Rule 2004 examination, in fact, is so broad it has been characterized as a “fishing expedition.” *In re Szadkowski*, 198 B.R. 140, 140 (Bankr. D. Md. 1996); *In re Duratech Indus.*, 241 B.R. 291 (Bankr. E.D.N.Y. 1999), *aff’d*, 241 B.R. 283 (N.D.N.Y. 1999).

#### **Factual Predicate for the Instant Rule 2004 Examination**

12. Upon investigation into the assets, business operations, and financial affairs of Chasen Construction and its numerous affiliated business entities (hereinafter referred to as the “Chasen Related Entities”) and Mr. Chasen, the Trustees discovered that on September 9, 2024, Chasen Construction wired \$601,000 to an escrow account maintained by the law firm of Baker Donelson allegedly for the benefit of Paul Davis. Further investigation revealed that just three weeks later, on September 30, 2024, a significant portion of the Chasen Construction funds transferred into the aforementioned escrow account (\$200,000) were then wired to an account in the name of Love’s Exotics.

13. The Chief Executive Officer of Love’s Exotics is Hannah Ruth Delay, according to the 2025 Florida Limited Liability Company Annual Report filed by the company. Ms. Delay,

who is also known as “Hannah Love,” is Brandon Chasen’s girlfriend, according to Mr. Chasen’s sworn testimony at his meeting of creditors herein.

14. The Trustees desire to examine Love’s Exotics to learn more about the aforementioned transactions (and any prior, subsequent or related transactions) and to learn more about the business relationship, if any, between Chasen Construction and Love’s Exotics as well as the relationships that exist between and among Mr. Chasen, Mr. Davis, Ms. Delay and/or the various entities with which they are associated.

15. The Trustees also seek to obtain documents, including ESI, from Love’s Exotics regarding: (a) any financial transactions between the Debtors or the Debtors’ affiliates on the one hand, and Love’s Exotics or its affiliates on the other hand, (b) the bank accounts maintained by Love’s Exotics or its affiliates into which the funds that originated with the Debtors or the Debtors’ affiliates were deposited, including monthly statements for said accounts, account opening documents, and related notices and correspondence; (c) the disposition of any such funds including, without limitation, the \$200,000 wired into Love’s Exotics’ account on September 30, 2024, and including any subsequent transfers of any of said funds by Love’s Exotics or its affiliates; and (d) communications and relationships with, by, and among Love’s Exotics or its affiliates on the one hand, and the Debtors or the Debtors’ affiliates on the other hand including Mr. Davis.

16. Accordingly, your Movants now seek leave by the instant *Motion* to take the Rule 2004 examination of Love’s Exotics and to request the production of documents from said examinee pursuant to a standard *Subpoena for Rule 2004 Examination*.

17. Movants respectfully urge that the requested Rule 2004 examination is in the best interests of creditors and all parties-in-interest in the above-captioned bankruptcy cases.

18. Pursuant to Local Rule 9013-2, Movants state that no memorandum of fact and law will be filed and that they will rely solely upon this motion.

**Conclusion**

WHEREFORE, Movants respectfully pray that this Honorable Court grant the instant *Motion* and order that a Rule 2004 examination of Love's Exotics LLC be conducted herein.

Respectfully submitted,

SCHLOSSBERG | MASTRO

/s/ Frank J. Mastro

Frank J. Mastro #24679

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*Attorneys for Zvi Guttman, Ch. 7 Trustee*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **16th** day of **January 2026**, a copy of the foregoing *Motion for Rule 2004 Examination of Love's Exotics LLC* together with all: (i) attachments or exhibits referenced therein or attached thereto; and (ii) a proposed form of Order (collectively, the "*Service Set*") was served:

(a) via electronic mail to those individuals included on the *Electronic Mail Notice List* at those email addresses noted thereon as follows;

25-12356 Notice will be electronically mailed to:	25-15437 Notice will be electronically mailed to:
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(b) via first-class mail, postage prepaid, as follows:

<p>Chasen Construction LLC Attn: Brandon Chasen 12 W. Montgomery Street Baltimore, MD 21230</p> <p>Robert L. Patrick SC&amp;H Group, Inc. 226 Schilling Circle, Suite 300 Hunt Valley, MD 21031</p> <p>Shepherd Electric Co., Inc. c/o Douglas H. Seitz, Esq. 1 Olympic Place, Suite 800 Towson, MD 21204</p>	<p>Larry Strauss Larry Strauss ESQ CPA &amp; Assoc., Inc. 2310 Smith Avenue Baltimore, MD 21209</p> <p>Love's Exotics LLC 68 SE 6th Street, Unit 808 Miami, FL 33131 serve: Hannah Ruth Delay, CEO/Resident Agent 68 SE 6th Street, Unit 808 Miami, FL 33131</p>
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/s/ Frank J. Mastro

/s/ Zvi Guttman